

ROBBINS GELLER RUDMAN
& DOWD LLP
SHAWN A. WILLIAMS (213113)
HADIYA K. DESHMUKH (328118)
SHAO-JIA CHANG (356004)
Post Montgomery Center
One Montgomery Street, Suite 1800
San Francisco, CA 94104
Telephone: 415/288-4545
415/288-4534 (fax)
shawnw@rgrdlaw.com
hdeshmukh@rgrdlaw.com
schang@rgrdlaw.com
– and –
MICHAEL A. TRONCOSO (221180)
DANIELLE S. MYERS (259916)
ASHLEY M. PRICE (281797)
655 West Broadway, Suite 1900
San Diego, CA 92101-8498
Telephone: 619/231-1058
619/231-7423 (fax)
mtroncoso@rgrdlaw.com
dmyers@rgrdlaw.com
aprice@rgrdlaw.com

Lead Counsel for Lead Plaintiff

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

STEPHEN MERRITT, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

BARCLAYS PLC, et al.,

Defendants.

) Case No. 2:23-cv-09217-MEMF-KS

) CLASS ACTION

) PLAINTIFFS' INITIAL DISCLOSURES
) PURSUANT TO RULE 26(a)(1)(A) OF THE
) FEDERAL RULES OF CIVIL PROCEDURE

I. PRELIMINARY STATEMENT

Pursuant to Rule 26(a)(1)(A) of the Federal Rules of Civil Procedure, Lead Plaintiff Teamsters Local 237 Additional Security Benefit Fund and Teamsters Local 237 Supplemental Fund for Housing Authority Employees and plaintiff The Firemen's Retirement System of St. Louis (collectively, "Plaintiffs") hereby serve their initial disclosures. These initial disclosures are made without waiver of, or prejudice to, any current or future objections Plaintiffs may have. Plaintiffs expressly reserve all objections, including, but not limited to: (a) relevance; (b) attorney-client privilege; (c) work product protection; (d) privacy; (e) any other applicable privilege or protection under federal or state law; (f) undue burden; (g) materiality; (h) overbreadth; and (i) the admissibility in evidence of these initial disclosures or the subject matter thereof. By referring to documents and individuals in these or any further amended initial disclosures, Plaintiffs (i) make no representations or concessions regarding the completeness, relevance, proportionality, appropriateness, or admissibility of any particular documents or information; and (ii) do not waive the right to object to Defendants' discovery requests on any basis.¹

These initial disclosures are based on information reasonably available to Plaintiffs at this time. Plaintiffs are continuing their investigation of this case, and discovery is in its preliminary stages. Discovery may reveal additional documents, individuals, and/or entities likely to have discoverable information that Plaintiffs may use to support their claims contained in the Second Amended Class Action Complaint for Violations of the Securities Laws of the United States and the United Kingdom (ECF 98) ("Complaint"). As such, Plaintiffs reserve the right to clarify, amend, modify, or supplement the information contained in these initial disclosures in accordance with the Federal Rules of Civil Procedure and the Civil Local Rules for the Central District of California ("Local Rules").

¹ "Defendants" are Barclays PLC ("Barclays" or the "Company"), Nigel Higgins ("Higgins"), and James E. Staley ("Staley").

**II. DISCLOSURE OF PERSONS WHO MAY HAVE DISCOVERABLE
INFORMATION PURSUANT TO RULE 26(a)(1)(A)(i) OF THE FEDERAL
RULES OF CIVIL PROCEDURE**

Plaintiffs believe the individuals and entities identified herein may have discoverable information pursuant to Rule 26(a)(1)(A)(i) of the Federal Rules of Civil Procedure concerning the allegations in the Complaint.² These disclosures are made based upon information reasonably available to Plaintiffs at this stage of the litigation and without prejudice to Plaintiffs' rights to identify or rely on facts provided by additional witnesses since discovery is in its preliminary stages. Plaintiffs incorporate by reference all individuals identified by Defendants in their initial disclosures and reserve the right to rely upon the testimony of all such individuals in support of their claims.

As indicated below, the following parties and non-parties may possess discoverable information pertaining to subjects including:

- (a) The Company's management structure and board oversight and governance before, during, and after the Class Period;³
- (b) The nature of James Staley and Jeffrey Epstein's relationship;
- (c) The nature of the relationship between Jeffrey Epstein and members of Staley's family;
- (d) The drafting of Barclays' October 8, 2019 letter to the United Kingdom's Financial Conduct Authority ("FCA");
- (e) The FCA's inquiry leading up to the October 8, 2019 letter and its subsequent investigation;
- (f) Documents or testimony provided in the course of the FCA's inquiry and investigation;

² Plaintiffs have identified addresses and telephone numbers where known but makes no representations as to the accuracy of such information, particularly with respect to any third parties that have been identified.

³ The "Class Period" is July 22, 2019 through October 12, 2023.

(g) Barclays' internal investigation and the evidence collected regarding Staley's relationship with Epstein resulting in Barclays' October 8, 2019 letter to the FCA;

(h) Barclays' internal inquiries, investigation, or analyses conducted upon notice that the FCA was opening an investigation regarding the October 8, 2019 letter;

(i) Barclays and its Board of Directors' ("Board") assessment of the financial, operational, regulatory, or reputational impact of Staley's relationship with Epstein;

(j) Staley's departure from Barclays;

(k) Defendants' statements or communications to investors, the media, analysts, and other third parties about Staley's relationship with Epstein and the FCA investigation;

(l) Media and analyst coverage of Barclays during the relevant time period;

(m) Barclays' filings with the U.S. Securities and Exchange Commission ("SEC") and filings published via the London Stock Exchange's Registered News Service;

(n) Defendants' communications with U.S. governmental authorities, including the SEC, concerning Staley's relationship with Epstein or the FCA investigation;

(o) Barclays' failure to disclose the nature of Staley's relationship with Epstein and that the nature of their relationship was not accurately represented to the FCA;

(p) Staley and Higgins' compensation;

(q) The Board's decisions regarding Staley's remuneration;

(r) Persons and entities that controlled Barclays;

(s) The expected or actual impact of Defendants' misrepresentations and omissions on the price of Barclays' securities;

(t) The causes of the stock drops on the alleged corrective disclosure dates; and

(u) Defendants' initial disclosures and affirmative defenses.

A. Plaintiffs

Plaintiffs are likely to have discoverable information concerning their purchases and sales of Barclays American Depositary Receipts ("ADRs") and ordinary shares. Plaintiffs may be contacted through their undersigned counsel.

Name	Contact Information	Subject of Information
Teamsters Local 237 Additional Security Benefit Fund and Teamsters Local 237 Supplemental Fund for Housing Authority Employees (“Teamsters”)	c/o Robbins Geller Rudman & Dowd LLP Post Montgomery Center One Montgomery Street Suite 1800 San Francisco, CA 94104 Telephone: 415/288-4545	Lead Plaintiff’s transactions in Barclays’ ADRs during the relevant period
The Firemen’s Retirement System of St. Louis (“St. Louis Firemen”)	c/o Robbins Geller Rudman & Dowd LLP Post Montgomery Center One Montgomery Street Suite 1800 San Francisco, CA 94104 Telephone: 415/288-4545	Plaintiff’s transactions in Barclays’ ordinary shares during the relevant period

B. Investment Managers

The following investment managers may have discoverable information concerning the purchase and sale of Barclays’ securities on behalf of Plaintiffs:

Name	Contact Information	Subject of Information
Teamsters	Todd Asset Management 101 South 5th Street Suite 3100 Louisville, KY 40202 Telephone: 502/585-3121	Lead Plaintiff’s transactions in Barclays’ ADRs during the relevant period
St. Louis Firemen	Fisher Investments 13100 Skyline Boulevard Woodside, CA 94062 Telephone: 650/425-9357	Plaintiff’s transactions in Barclays’ ordinary shares during the relevant period

C. Defendants

Defendants are likely to have discoverable information regarding the subject matter of Plaintiffs’ claims as alleged in the Complaint and any purported defenses.

Name	Contact Information	Subject of Information
Barclays PLC	c/o Sullivan and Cromwell LLP 125 Broad Street New York, NY 10004 Telephone: 212/558-4000	(a)-(u)
James E. Staley	c/o Williams and Connolly LLP 680 Maine Avenue, SW Washington, DC 20024 Telephone: 202/434-5000	(a)-(u)
Nigel Higgins	c/o Sullivan and Cromwell LLP 125 Broad Street New York, NY 10004 Telephone: 212/558-4000	(a)-(u)

D. Current and Former Directors, Executives, and Employees of Barclays PLC

Defendants are in the best position to identify those with discoverable information relevant to the class claims. Defendants are also in the best position to know the contact information for such persons. Subject to and without waiving the reservations and disclaimers above, the following individuals are likely to have discoverable information regarding the subject matter of Plaintiffs' claims as alleged in the Complaint and any purported defenses.

Name	Contact Information	Subject of Information
Ashley, Mike	Foundation for Credit Counseling 123 Albion Street Leeds, LS2 8ER United Kingdom Telephone: +44 08001381111	(a)-(u)
Bernard, Peter	Upstart Holdings, Inc. 2950 S. Delaware Street Suite 410 San Mateo, CA 94403 Telephone: 833/212-2461	(a)-(u)
Berry, Robert	c/o Sullivan and Cromwell LLP 125 Broad Street New York, NY 10004 Telephone: 212/558-4000	(a)-(u)
Breedon, Tim	Apax Global Alpha Limited PO Box 656 East Wing, Trafalgar Court Les Banques St Peter Port, GY1 3PP Guernsey Telephone: +44 7979536650	(a)-(u)

Name	Contact Information	Subject of Information
Cheshire, Sir Ian	Land Securities Group PLC 100 Victoria Street London, SW1E 5JL United Kingdom Telephone: +44 (0) 20 7413 9000	(a)-(u)
Citrino, Mary Anne	The Blackstone Group 345 Park Avenue New York, NY 10154 Telephone: 212/583-5000	(a)-(u)
Cross, Alexander	c/o Sullivan and Cromwell LLP 125 Broad Street New York, NY 10004 Telephone: 212/558-4000	(a)-(u)
da Silva, Elizabeth	HSBC Holdings PLC 8 Canada Square Canary Wharf Retail E14 5AH United Kingdom Telephone: +44 (0) 345 740 4404	(a)-(u)
Dickinson, Lawrence	Barclays Private Bank Geneva Chemin de Grange 1224 Chêne Bougeries Geneva Telephone: +41 (0) 22 819 5112	(a)-(u)
Doherty, Stephen	Aviva PLC 80 Fenchurch Street London, EC3M 4AE United Kingdom Telephone: +44 (0)20 7283 2000 (option 4)	(a)-(u)
El-Erian, Mohamed A.	c/o Sullivan and Cromwell LLP 125 Broad Street New York, NY 10004 Telephone: 212/558-4000	(a)-(u)
Everett, Kirsty	Not available	(a)-(u)
Ewart, Steven	Barclays Execution Services Limited 1 Churchill Place London, E14 5HP United Kingdom Telephone: +44 020 7116 9000	(a)-(u)
Fitzpatrick, Dawn	c/o Sullivan and Cromwell LLP 125 Broad Street New York, NY 10004 Telephone: 212/558-4000	(a)-(u)
Fitzwater, Matthew	c/o Sullivan and Cromwell LLP 125 Broad Street New York, NY 10004 Telephone: 212/558-4000	(a)-(u)
Francis, Mary	c/o Sullivan and Cromwell LLP 125 Broad Street New York, NY 10004 Telephone: 212/558-4000	(a)-(u)

Name	Contact Information	Subject of Information
Gillies, Crawford	Kinnauld House Dunkeld Perthshire, PH8 OLB Scotland	(a)-(u)
Gilvary, Alexander	c/o Sullivan and Cromwell LLP 125 Broad Street New York, NY 10004 Telephone: 212/558-4000	(a)-(u)
Hoskin, Thomas	c/o Sullivan and Cromwell LLP 125 Broad Street New York, NY 10004 Telephone: 212/558-4000	(a)-(u)
Hoyt, Robert	HSBC Holdings PLC 8 Canada Square Canary Wharf Retail E14 5AH United Kingdom Telephone: +44 (0) 345 740 4404	(a)-(u)
Keelan, Helen	Irish Life Lower Abbey Street Dublin1 Ireland Telephone: +353 (0) 1 704 1979	(a)-(u)
Kingman, Sir John	c/o Sullivan and Cromwell LLP 125 Broad Street New York, NY 10004 Telephone: 212/558-4000	(a)-(u)
Lester, Matthew	ICG PLC Procession House 55 Ludgate Hill, London, EC4M 7JW England United Kingdom Telephone: +44 (0) 20 3545 2000	(a)-(u)
Morzaria, Tushar	Legal and General Group One Coleman Street London, EC2R 5AA United Kingdom Telephone: +44 20 3124 2000	(a)-(u)
Moses, Marc	c/o Sullivan and Cromwell LLP 125 Broad Street New York, NY 10004 Telephone: 212/558-4000	(a)-(u)
Padovani, Laura	Deutsche Bank AG Taunusanlage 12 60325 Frankfurt am Main Germany Telephone: +49 69 910-00	(a)-(u)

Name	Contact Information	Subject of Information
Richter, Maria	Rexel Group 13 boulevard du Fort de Vaux CS 60002 - 75838 Paris, Cedex 17 France Telephone: +33 (0)1 42 85 85 00	(a)-(u)
Scheuneman, Diane	4801 Bonita Bay Boulevard Unit 1501 Bonita Springs, FL 34134 Telephone: 239/992-1442	(a)-(u)
Scott, Jeremy	Not available	(a)-(u)
Shah, Taalib	c/o Sullivan and Cromwell LLP 125 Broad Street New York, NY 10004 Telephone: 212/558-4000	(a)-(u)
Shapiro, Stephen	c/o Sullivan and Cromwell LLP 125 Broad Street New York, NY 10004 Telephone: 212/558-4000	(a)-(u)
Thursby, Alexander	Giggleswick International Limited Giggleswick School Settle, North Yorkshire BD24 0DE United Kingdom Telephone: +44 (0) 1729 893 000	(a)-(u)
Venkatakrishnan, C.S.	c/o Sullivan and Cromwell LLP 125 Broad Street New York, NY 10004 Telephone: 212/558-4000	(a)-(u)
Vletter Van Dort, Helene	STMicroelectronics Jean-Marc Chery Chemin du Champ des Filles 39 1228 Plan-les-Ouates Geneva Switzerland Telephone: +41 22 929 29 29	(a)-(u)
Wiggins, Sasha	c/o Sullivan and Cromwell LLP 125 Broad Street New York, NY 10004 Telephone: 212/558-4000	(a)-(u)
Wilson, Julia	c/o Sullivan and Cromwell LLP 125 Broad Street New York, NY 10004 Telephone: 212/558-4000	(a)-(u)

E. Government and Regulatory Bodies

Plaintiffs believe the U.S. Securities and Exchange Commission, the United States Department of Justice, and U.K. financial regulatory bodies, including the FCA, and the following

individuals in particular, are likely to have discoverable information regarding Plaintiffs' claims, including, without limitation, the subjects identified below.

Name	Contact Information	Subject of Information
Bailey, Andrew	Financial Stability Board Secretariat to the Financial Stability Board Bank for International Settlements Centralbahnplatz 2 CH-4002 Basel Switzerland Telephone: +41 61 280 8844	(b)-(o)
Bank of England	Threadneedle Street London, EC2R 8AH United Kingdom Telephone: +44 020 3461 4444	(b)-(o)
Carney, Mark	Office of the Prime Minister of Canada 80 Wellington Street Ottawa, ON K1A 0A2 Telephone: 613/957-5555	(b)-(o)
Collins-Firth, Sarah	12 Endeavour Square London, E20 1JN United Kingdom Telephone: +44 207 066 1000	(b)-(o)
Davidson, Jonathan	Not available	(b)-(o)
Financial Conduct Authority	12 Endeavour Square London, E20 1JN United Kingdom Telephone: +44 207 066 1000	(b)-(o)
Prudential Regulation Authority	20 Moorgate London, EC2R 6DA United Kingdom Telephone: +44 (0) 20 3461 7000	(b)-(o)
Steward, Mark	Dubai Financial Services Authority Level 13, West Wing, The Gate, DIFC PO Box 75850 Dubai, UAE Telephone: +971 (0)4 362 1500	(b)-(o)
U.S. Department of Justice	950 Pennsylvania Ave NW Washington, DC 20530 Telephone: 202/514-2000	(b)-(o)
U.S. Securities and Exchange Commission	100 F Street, NE Washington, DC 20549 Telephone: 202/551-6551	(b)-(o)

Name	Contact Information	Subject of Information
Woods, Sam	Bank of England Threadneedle Street London, EC2R 8AH United Kingdom Telephone: +44 020 3461 4444	(b)-(o)

F. Advisors and Attorneys

Plaintiffs believe that the following advisors and attorneys are likely to have discoverable information regarding Plaintiffs' claims, including, without limitation, the subjects identified below.

Name	Contact Information	Subject of Information
Chance, Clifford	10 Upper Bank Street London, E14 5JJ United Kingdom Telephone: +44 20 7006 1000	(a)-(q), (u)
Farmer, John	12 Cherryville Stanton Road Flemington, NJ 08822 Telephone: 908/328-8612	(a)-(q), (u)
Harris, Kathleen	Arnold & Porter Tower 42 25 Old Broad Street London, EC2N 1HQ United Kingdom Telephone: +44 (0)20 7786 6100	(a)-(q), (u)
Higgins, Nichola	Matrix Chambers London Griffin Building Gray's Inn London, WC1R 5LN United Kingdom Telephone: +44 (0)20 7404 3447	(a)-(q), (u)
Smith, Robert	New Park Court 16 Park Place Leeds, LS1 2SJ United Kingdom Telephone: +44 (0)113 203 5504	(a)-(q), (u)

G. Investment Banks and Analyst Firms

Plaintiffs believe that the following investment banks and analyst firms are likely to have discoverable information regarding Plaintiffs' claims, including, without limitation, the subjects identified below.

Name	Contact Information	Subject of Information
RBC Europe Limited	100 Bishopsgate London, EC2N 4AA United Kingdom Telephone: +44 207 653 4000	(k)-(l)
Investec	30 Gresham Street London, EC2V 7QP United Kingdom Telephone: +44 (0)20 7597 4000	(k)-(l)
Shore Capital Markets	8A2 The Plaza, 100 Old Hall Street Liverpool, L3 9QJ United Kingdom Telephone: +44 (0)151 600 3700	(k)-(l)
Berenberg	60 Threadneedle Street London, EC2R 8HP United Kingdom Telephone: +44 20 3207 7800	(k)-(l)
Kepler Cheuvreux	Kepler Cheuvreux France 112 Avenue Kleber 75016 Paris France Telephone: +33 1 53 65 35 00	(k)-(l)
Credit Suisse	5 Broadgate London, EC2M 2QS United Kingdom Telephone: +44 20 7883 9900	(k)-(l)
JPMorgan	25 Bank Street Canary Wharf London, E14 5JP United Kingdom Telephone: +44 20 7742 4000	(k)-(l)
UBS	5 Broadgate London, EC2M 2QS United Kingdom Telephone: +44-20 7567 8000	(k)-(l)

H. Media and News Sources

Plaintiffs believe that the following media and news sources are likely to have discoverable information regarding Plaintiffs' claims, including, without limitation, the subjects identified below.

Name	Contact Information	Subject of Information
The New York Times	242 W 41st St New York, NY 10036 Telephone: 212/556-1234	(k)-(l)
The Wall Street Journal	1211 Avenue of the Americas New York, NY 10036 Telephone: 800/568-7625	(k)-(l)
Bloomberg	731 Lexington Avenue New York, NY 10022 Telephone: 212/318-2000	(k)-(l)
Bloomberg Television	731 Lexington Avenue New York, NY 10022 Telephone: 212/318-2000	(k)-(l)
Evening Standard	2 Derry Street London, W8 5TT United Kingdom Telephone: +44 (0) 20 3367 7000	(k)-(l)
Financial Times	Bracken House 1 Friday Street London, EC4M 9BT United Kingdom Telephone: +44 (0) 20 7873 3000	(k)-(l)
The Mail on Sunday	Northcliffe House 2 Derry Street Kensington, London, W8 5TT United Kingdom Telephone: +44 (0) 20 7938 6000	(k)-(l)

I. Other Third Parties

Plaintiffs believe that the following media and news sources are likely to have discoverable information regarding Plaintiffs' claims, including, without limitation, the subjects identified below.

Name	Contact Information	Subject of Information
JPMorgan Chase & Co.	383 Madison Avenue New York, NY 10017 Telephone: 212/270-6000	(b)-(c), (f)
Debora Staley	930 Park Avenue, Apt. 6N New York, NY 10028 Telephone: 212/744-0770	(b)-(c), (i)-(j), (o)
Alexa Staley	2121 Webster Street Apt. TH4 San Francisco, CA 94115 Telephone: 646/369-2256	(b)-(c), (i)-(j), (o)

Name	Contact Information	Subject of Information
Sophia N. Stefanovic	950 Park Avenue, Apt. 10A New York, NY 10028 Telephone: 646/369-2259	(b)-(c), (i)-(j), (o)
Bowdoin College Board of Trustees	255 Main Street Brunswick, ME 04011 Telephone: 207/725-3000	(b)-(d), (g)

III. COPY OR DESCRIPTION BY CATEGORY OF DOCUMENTS AND TANGIBLE THINGS RELEVANT TO FACTS IN THE PLEADINGS UNDER RULE 26(a)(1)(A)(ii) OF THE FEDERAL RULES OF CIVIL PROCEDURE

Plaintiffs, through their counsel, disclose that they have in their possession, custody, or control and may use to support the claims alleged in the Complaint: (i) records identifying and concerning Plaintiffs' transactions in Barclays securities; (ii) documents regarding Barclays that were publicly filed with the SEC and Regulatory News Service, or are publicly available media articles, press releases, and analyst reports; and (iii) documents referenced in the Complaint.

IV. COMPUTATION OF DAMAGES UNDER RULE 26(a)(1)(A)(ii) OF THE FEDERAL RULES OF CIVIL PROCEDURE

As stated in the Complaint, Plaintiffs, on behalf of themselves and the proposed class, seek class-wide damages, including interest, reasonable costs, including attorneys' fees and expenses, and such equitable relief or other relief as the Court may deem just and proper. Plaintiffs reserve the right to seek other damages in this action.

A. Compensatory Damages

The calculation of damages in this action requires expert testimony and discovery. Plaintiffs will provide their expert's opinion(s) on damages in accordance with Rule 26 and at the time set forth in the operative scheduling order (ECF 106).

B. Attorneys' Fees and Costs

Plaintiffs' attorneys' fees and costs are being incurred on an ongoing basis, and Plaintiffs are presently unable to state the amount for this claim.

C. Pre-Judgment and Post-Judgment Interest at the Highest Rate Permitted by Law

Because the accrual of pre-judgment interest is ongoing and accrual of post-judgment interest will not begin to accrue until after the judgment is obtained, Plaintiffs are unable to calculate the amount owed at this time.

Plaintiffs reserve the right to seek any other damages to which they are legally entitled in this action.

V. ANY INSURANCE AGREEMENT UNDER WHICH AN INSURANCE BUSINESS MAY BE LIABLE TO SATISFY ALL OR PART OF A JUDGMENT UNDER RULE 26(a)(1)(A)(iv) OF THE FEDERAL RULES OF CIVIL PROCEDURE

This information sought by this portion of Rule 26(a)(1)(A)(iv) of the Federal Rules of Civil Procedure is inapplicable to Plaintiffs.

DATED: August 14, 2025

ROBBINS GELLER RUDMAN
& DOWD LLP
MICHAEL A. TRONCOSO
DANIELLE S. MYERS
ASHLEY M. PRICE

[Signature]

ASHLEY M. PRICE

655 West Broadway, Suite 1900
San Diego, CA 92101-8498
Telephone: 619/231-1058
619/231-7423 (fax)
mtroncoso@rgrdlaw.com
dmyers@rgrdlaw.com
aprice@rgrdlaw.com

1
2 ROBBINS GELLER RUDMAN
3 & DOWD LLP
4 SHAWN A. WILLIAMS
5 HADIYA K. DESHMUKH
6 SHAO-JIA CHANG
7 Post Montgomery Center
8 One Montgomery Street, Suite 1800
9 San Francisco, CA 94104
10 Telephone: 415/288-4545
11 415/288-4534 (fax)
12 shawnw@rgrdlaw.com
13 hdeshmukh@rgrdlaw.com
14 schang@rgrdlaw.com

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Lead Counsel for Lead Plaintiff

DECLARATION OF SERVICE BY EMAIL

I, RACHAEL ACOSTA, not a party to the within action, hereby declare that on August 14, 2025, I served the attached PLAINTIFFS' INITIAL DISCLOSURES PURSUANT TO RULE 26(a)(1)(A) OF THE FEDERAL RULES OF CIVIL PROCEDURE on the parties in the within action by email addressed as follows:

COUNSEL FOR PLAINTIFFS:

NAME	FIRM	EMAIL
Shawn A. Williams	Robbins Geller Rudman & Dowd LLP	shawnw@rgrdlaw.com
Hadiya K. Deshmukh	Robbins Geller Rudman & Dowd LLP	hdeshmukh@rgrdlaw.com
Shao-Jia Chang	Robbins Geller Rudman & Dowd LLP	schang@rgrdlaw.com
Michael A. Troncoso	Robbins Geller Rudman & Dowd LLP	mtroncoso@rgrdlaw.com
Danielle S. Myers	Robbins Geller Rudman & Dowd LLP	dmyers@rgrdlaw.com
Ashley M. Price	Robbins Geller Rudman & Dowd LLP	aprice@rgrdlaw.com

COUNSEL FOR DEFENDANTS:

NAME	FIRM	EMAIL
Adam S. Paris	Sullivan & Cromwell LLP	parisa@sullcrom.com
Jeffrey T. Scott	Sullivan & Cromwell LLP	scottj@sullcrom.com
Matthew J. Porpora	Sullivan & Cromwell LLP	porporam@sullcrom.com
Peter B. Morrison	Skadden, Arps, Slate, Meagher & Flom LLP	peter.morrison@skadden.com
Scott D. Musoff	Skadden, Arps, Slate, Meagher & Flom LLP	scott.musoff@skadden.com
Boris Bershteyn	Skadden, Arps, Slate, Meagher & Flom LLP	boris.bershteyn@skadden.com
Lara A. Flath	Skadden, Arps, Slate, Meagher & Flom LLP	lara.flath@skadden.com
Matthew Donald Umhofer	Umhofer, Mitchell & King LLP	matthew@umklaw.com
Elizabeth Mitchell	Umhofer, Mitchell & King LLP	elizabeth@umklaw.com
Brendan V. Sullivan, Jr.	Williams & Connelly LLP	bsullivan@wc.com
John M. McNichols	Williams & Connelly LLP	jmcnichols@wc.com
Stephen L. Wohlgemuth	Williams & Connelly LLP	swohlgemuth@wc.com

NAME	FIRM	EMAIL
Jesse R. Westerhouse	Williams & Connelly LLP	jwesterhouse@wc.com

* Denotes service via hand delivery and email

I declare under penalty of perjury that the foregoing is true and correct. Executed on
August 14, 2025, at San Francisco, California.



RACHAEL ACOSTA